

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CHRISTOPHER PAGE, JR.

Plaintiff,

v.

DONNIE KUKAN and
RED CLAY CONSOLIDATED SCHOOL
DISTRICT,

Defendants.

C.A. No. 05-32

JURY TRIAL DEMANDED

**DEFENDANTS' REQUEST FOR PRODUCTION
DIRECTED TO PLAINTIFF**

Defendants hereby propound the following requests for production of certain documents and things upon the plaintiff and requests, pursuant to Rule 34 of the Federal Rules of Civil Procedure that Plaintiff responds to the requests by producing all responsive documents in their possession, custody or control or the possession, custody or control of his attorney within thirty (30) days of the service of these requests upon them. Production is to be made to the undersigned counsel at 1011 Centre Road, Suite 210, Wilmington, DE 19805.

REQUESTS FOR PRODUCTION

1. All documents referred to or relied upon in Plaintiff's Answers to Interrogatories.

ANSWER:

2. All statements taken of any person relating to, referring to, mentioning or describing any of the facts of this case. Please note that production should be made of any form in which such statements are held. For example, if the statements are

recorded but not transcribed, such statements should be produced in their recorded form. If such statements are recorded and transcribed, they should be produced in both forms.

ANSWER:

3. All medical records including, without limitation, all notes, memos, MRIs, CT-Scans, EMG's, X-rays, reports, diagnoses, physical therapy notes, and all other records relating to any medical condition you claim to have suffered in connection with the incident which is the subject matter of this case.

ANSWER:

4. Copies of any and all photographs, videotapes, motion pictures, sketches, diagrams, plats or other drawings taken or prepared by you or on your behalf or in your possession or available to you concerning any aspect of this litigation.

ANSWER:

5. Copies of all reports of investigation, findings of fact, observation of facts or circumstances, or any other matter relating to any aspect of the litigation.

ANSWER:

6. Copies of any and all writings identified or referred to in your answers to defendant's interrogatories.

ANSWER:

7. Copies of all statements, bills or cancelled checks showing the amount charged for services rendered to the plaintiff(s) in connection with the care of his/her alleged physical injuries.

ANSWER:

8. Copies of any reports by any person qualifying as an expert containing opinions and/or facts on which opinions are based concerning any aspect of the litigation.

ANSWER:

9. Copies of any and all writings which you intend to rely upon in any way at trial.

ANSWER:

10. Copies of all statements by the defendant(s), plaintiff(s), and other persons or witnesses relating to the incident in question or any other aspect of this litigation.

ANSWER:

11. Copies of all medical records and reports concerning the plaintiff's past, present or future physical condition or treatment.

ANSWER:

12. Copies of any and all writings in your possession or available to you in addition to the items specified in previous sections of this Request for Production which pertain in any way to the issues raised by the pleadings herein.

ANSWER:

MURPHY SPADARO & LANDON
/s/ Roger D. Landon
ROGER D. LANDON, I.D. No. 2460
1011 Centre Road, Suite 210
Wilmington, DE 19805
(302) 472-8112
Attorney for Defendants

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CERTIFICATE OF SERVICE

I, Roger D. Landon, Esq., do hereby certify that on this 22nd day of April, 2005,
two copies of the foregoing **REQUESTS FOR PRODUCTION DIRECTED TO
PLAINTIFF** were delivered via e-file and First Class Mail to the following individual(s):

James F. Kipp, Esq.
Trzuskowski Kipp & Kelleher
1010 Concord Avenue, #101
P.O. Box 429
Wilmington, DE 19899-0429

MURPHY SPADARO & LANDON

/s/ Roger D. Landon
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1011 Centre Road, #210
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(302) 472-8112
Attorney for Defendants